

State Water Resources Control Board

April 10, 2015

Ms. Stephanie Forsey
Public Storage, Inc.
701 Western Avenue
Glendale, CA 91201-2349
[Via email only] (sforsey@publicstorage.com)

Dear Ms. Forsey:

CLOSURE DENIAL REVIEW FOR PETROLEUM UNDERGROUND STORAGE TANK CASE, PS PUBLIC STORAGE, 510 16TH STREET, SAN DIEGO, SAN DIEGO COUNTY

State Water Resources Control Board (State Water Board) Resolution No. 2012-0062 requires that State Water Board staff review a lead agency's decision when the lead agency has denied a request by a responsible party for an underground storage tank (UST) case closure pursuant to the Low-Threat UST Case Closure Policy.

The subject site has the following identification numbers:

- State Water Board, GeoTracker No. T0607302935
- San Diego Regional Water Quality Control Board (San Diego Water Board), Case No. 9UT668
- County of San Diego, Case No. H01100-001

The State Water Board reviewed the closure request dated July 17, 2014 and the response from the San Diego Water Board. After careful consideration of the GeoTracker record, State Water Board staff agrees with the San Diego Water Board staff determination that all of the General and Media-Specific Criteria have not been met. Based on information in the above-referenced case file, this agency finds that this site does not meet the following General and Media-Specific Criteria:

- General Criteria **b** – The unauthorized release consists only of petroleum.
- General Criteria **d** – Free product has been removed to the maximum extent practicable.
- General Criteria **e** – A conceptual site model that assesses the nature, extent, and mobility of the release has been developed.
- General Criteria **f** – Secondary source has been removed to the extent practicable.
- Petroleum Vapor Intrusion to Indoor Air, Media-Specific Criteria **2a.**, **Scenario 1** - Total petroleum hydrocarbon (TPH) as gasoline and diesel (TPH-g and TPH-d combined) are less than 100 milligrams per kilogram (mg/kg) throughout the entire depth of the bioattenuation zone.

There is a significant amount of petroleum in soil and groundwater beneath the site. The most recent groundwater monitoring and sampling event was completed during December 2012. Chlorinated solvents are present in soil and groundwater beneath the site. San Diego County Case No. H#01100-002 has been opened to provide oversight for corrective actions related to the chlorinated solvents. During December 2012, free product was found in monitoring wells MW-R1 and MW-26 up to a thickness of 0.29 feet and concentrations of benzene in wells MW-1R, MW-16, and MW-28 were greater than 3,000 micrograms per liter ($\mu\text{g/l}$). The lateral extent of the petroleum plume is not defined to the north and west of the site. Soil boring samples collected, within the upper 30 feet of the subsurface, from the northern portion of the site contained concentrations of TPH-g in excess of 100 mg/kg.

Petroleum constituents in soil and groundwater continue to pose a threat to human health, safety and the environment. Criteria for low-threat UST case closure have not been met at this time, and therefore, closure of the UST case is not appropriate.

If you have any questions, please contact Mr. Benjamin Heningburg at (916) 341-5749 or Benjamin.Heningburg@waterboards.ca.gov.

Sincerely,



Victoria A. Whitney, Deputy Director
Division of Water Quality

cc: Mr. Robert Baker
Antea Group
3229 E. Spring St., Ste. 100
Long Beach, CA 90806

[Via email only]

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